

ESTTA Tracking number: **ESTTA616641**

Filing date: **07/21/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91212944
Party	Defendant Sowind SA
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Date	07/21/2014
Attachments	H00184ExecutedAnswertoNoticeofOppositionasfiled.pdf(414718 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Tony Hawk, Inc.,

Opposer,

vs.

Sowind SA,

Applicant.

Opposition No. 91/212,944

**ANSWER TO NOTICE OF OPPOSITION**

Applicant, by its attorney, hereby responds to allegations set forth in the Notice of Opposition as follows:

1. Applicant admits that it filed an application for the mark HAWK under Section 66(d) of The Lanham Act for goods in International Class 14 described as "timepieces and chronometric instruments, namely, watches, wristwatches, chronometers, clocks, table clocks, movements for timepieces; jewelry; not all of the aforesaid goods being shaped like a hawk" with a claim of priority of October 9, 2012, and that that Application received Serial No. 79/129592. Applicant denies the remaining allegations in Paragraph 1.

2. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 2 of the Notice of Opposition, and, therefore, denies said allegations.

3. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 3 of the Notice of Opposition, and, therefore, denies said allegations.

4. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 4 of the Notice of Opposition, and, therefore, denies said allegations.

5. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 5 of the Notice of Opposition, and, therefore, denies said allegations.

6. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 6 of the Notice of Opposition, and, therefore, denies said allegations.

7. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 7 of the Notice of Opposition, and, therefore, denies said allegations.

8. Applicant denies that it is using Mr. Hawk's name and has violated Section 2(c). As to the remaining allegations, Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 8 of the Notice of Opposition, and, therefore, denies said allegations.

9. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 9 of the Notice of Opposition, and, therefore, denies said allegations.

10. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 10 of the Notice of Opposition, and, therefore, denies said allegations.

11. Applicant denies the allegations set forth in numbered paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations set forth in numbered paragraph 12 of the Notice of Opposition.

13. Applicant denies the allegations set forth in numbered paragraph 13 of the Notice of Opposition.

14. Applicant denies the allegations set forth in numbered paragraph 14 of the Notice of Opposition.

15. Applicant denies the allegations set forth in numbered paragraph 15 of the Notice of Opposition.

16. Applicant denies the allegations set forth in numbered paragraph 16 of the Notice of Opposition.

17. Applicant admits that it does not have Opposer's consent to use Applicant's Mark.

WHEREFORE, Applicant requests that the opposition be dismissed with prejudice.

Respectfully submitted,




Gary D. Krugman  
Leigh Ann Lindquist  
Attorneys for Applicant  
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Date: July 21, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing ANSWER TO NOTICE OF OPPOSITION has been served via email and first class mail, postage prepaid, this 21<sup>st</sup> day of July 2014 on:

John R Sommer  
17426 Daimler Street  
Irvine, CA 92614  
Sommer@Stussy.Com

  
Leigh Ann Lindquist